

Donald W. Harrison, Asst. District Director
U.S. Dept. of Labor, Wage & Hour Division
550 Main Street, Room 10-409
Cincinnati, OH 45202-5208

3. Defendant shall enclose with such check a letter identifying the case name as *Perez v. DNA Diagnostics Center, Inc.*, listing Defendant's tax identification number, and listing legal deductions made from the gross amount due. Defendant shall be responsible for computing and paying all employer taxes, including any applicable federal, state or local taxes.

4. Neither Defendant nor anyone on its behalf shall directly or indirectly solicit or accept the return or refusal of any sums paid under this Judgment.

5. If Defendant fails to make the payment referenced hereinabove within the time required by this Judgment, the amount shall be immediately due and owing and shall be subject to the assessment of such interest and costs as required by the Debt Collection Improvement Act of 1996 (Public Law 104-134) published by the Secretary of the Treasury in the Federal Register.

6. Defendant agrees to immediately remove and expunge Danielle Perdue's ("Complainant's") employment record of all references to this action and to all disciplinary actions, including termination, which preceded the filing of the discrimination complaint in this action.

7. If in the future any prospective employer of Complainant contacts Defendant regarding a job reference, Defendant shall give no less than a neutral job reference. Defendant shall provide the starting and ending dates of Complainant's employment, job title, and/or rate of pay, as requested by the person or entity seeking the employment reference. Defendant shall not say or convey anything to any third party that could be construed as damaging the name, character, or employment of Complainant.

8. Defendant, its agents, servants, employees and all persons in active concert or participation with them, are hereby permanently enjoined and restrained from violating sections 102, 104, and 105 of the Act, 29 U.S.C. §§ 2612, 2614, 2615, and its Regulations published at 29 C.F.R. Part 825. Nothing in this section shall act as an admission of liability by Defendant, as stated in the opening paragraph of this Stipulated Judgment.

9. Each party shall bear its own costs and expenses, including attorneys' fees, arising in connection with any stage of the above-referenced proceeding including but not limited to, attorney's fees which may be available under the Equal Access to Justice Act, as amended.

10. The district court shall retain jurisdiction over this case for purposes of enforcing this Consent Judgment Order.

Dated: 1/13/14


HERMAN J. WEBER
United States District Judge

Dated: 1/9/14

Dated: 1/10/14

/s/ Victor T. Geraci
VICTOR T. GERACI (40352)
Trial Attorney for Defendant

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/s/ Matthew M. Scheff
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